

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKLatiff Thompson

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

Kahla Cadore (Official & Individual Capacity)
Siwy Made (Official & Individual Capacity)
Gene Park (Official & Individual Capacity)
Edward J. McLaughlin (Official & Individual Capacity)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Latiff Anthony Thompson

ID #

441-17-07062

Current Institution

A.M.K.C (Anna M. Kross Correctional)

Address

18-18 Hazen St, East Elmhurst, N.Y. 11370Home Address121-02 Sutphin Blvd Apt E302
Samaica, New York 11434

- B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name

Kahla Cadore

Shield #

Where Currently Employed

Last Known Police Station PSA 5

Address

RECEIVED
JUN 11 2018
JUN 11 2018
DOCKET UNIT

COMPLAINT

under the

Civil Rights Act, 42 U.S.C. § 1983
(Prisoner Complaint)Jury Trial: ☒ Yes ☐ No

(check one)

18CV4105

Defendant No. 2

Name Siwy Made Shield # _____
 Where Currently Employed Last known Police Station PSA5
 Address _____

Defendant No. 3

Name Gene Park Shield # _____
 Where Currently Employed Last known Police station PSA5
 Address _____

Defendant No. 4

Name Edward J. McLaughlin Shield # _____
 Where Currently Employed Last known Supreme Court New York court
 Address 100 Centre Street
New York, New York 10013

Defendant No. 5

Name _____ Shield # _____
 Where Currently Employed _____
 Address _____

II. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur?

N/A

B. Where in the institution did the events giving rise to your claim(s) occur?

N/A

C. What date and approximate time did the events giving rise to your claim(s) occur?

The events occurred August 22, 2011 around
11:25 p.m.

D.

Facts:

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

On August 22, 2011 I was exiting a building in Johnson Housing Project in Harlem. Three other young black males walked out the building before I did, on exiting the building I was confronted by officers Kahla Cadore, Gene Park & Siwy Made. This confrontation occurred because these officers were looking for robbery suspects. Even though I did not at all fit the description of the suspects, me and the other males was detained in front of the building by the officers. I went to show officer Made my identification then one of the males that was detained with me fled. Immediately officer Cadore drew her gun and pointed it in my face. Officer Siwy Made then went to pat frisk me, he went around my waistband and in my pockets nothing was found he even states that on record. The officers then waited with all of us for the complainant to arrive for a showup. I wasn't identified by complainant, then officer Made claimed to notice a bulge in my waistband where a gun was recovered, then another search of my pockets revealed the victim's credit card. I was arrested and detained. Judge Edward S. McLaughlin was my pre-trial & trial judge presiding over the case. As me and my lawyer proceeded to the suppression hearing with overwhelming evidence of a illegal search and illegal arrest, I was met by malicious prosecution from Judge McLaughlin. (See Attached pg 1)

III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Mental Anguish, Post traumatic stress disorder,

IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes _____ No ✓

I was denied suppression of the gun and credit card.

Soon later on that month i went to trial to absolve myself of the charges, i was blindsided by more malicious prosecution that Judge McLaughlin encouraged. Judge McLaughlin allowed a man to testify on stand to a crime i was never charged with, or even standing trial for. This disregard for fair trial echoed true when during deliberations the panel kept coming back with questions about a crime that i wasnt on trial for or charged with. I lost trial and was sentenced to a term of twelve and half years. On May 23, 2012.

I put in a notice of appeal with the appellate division first department. The panel of judges unanimously reversed, on the law, the motion to suppress granted and the indictment dismissed. This was entered on April 30 2015, and decided on April 30 2015. I was a victim of a illegal search, illegal Arrest & unlawful imprisonment with malicious prosecution from Judge McLaughlin.

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

N/A

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes ____ No ____ Do Not Know ____

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes ____ No ____ Do Not Know ____

If YES, which claim(s)? _____

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes ____ No ____

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes ____ No ____

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

1. Which claim(s) in this complaint did you grieve? _____

2. What was the result, if any? _____

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process. _____

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here: _____

2. If you did not file a grievance but informed any officials of your claim, state who you informed, _____

when and how, and their response, if any: _____

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. _____

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. Relief:

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). I suffered Mental Anguish, Post traumatic stress disorder, illegal search, illegal Arrest, unlawful imprisonment for years, malicious prosecution, Constitutional violations cruel & unusual punishment I'm requesting 3.5 million dollars.

VI. Previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?
 Yes _____ No ✓

On
these
claims

- B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes ____ No ____

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

On
other
claims

- C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment?
Yes ____ No ____

- D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes ____ No ____

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 19 day of April, 2018

Signature of Plaintiff

Inmate Number

Institution Address

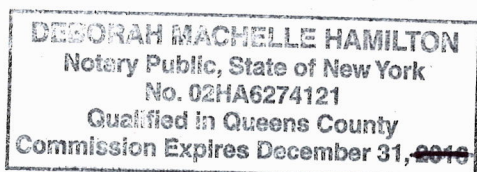
Latiff Thompson
44117-07062
18-18 Hazen Street
East Elmhurst, New York
11370

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 19 day of April, 2018 I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:

Latiff Thompson



2020

Latiff Thompson

441-17-07062

18-18 Hazen St

East Elmhurst, N.Y. 11370



2018 MAY -3 AM 9:08

PP 52 SM
United States District Court
Southern District of New York
Clerk of U.S. Court House
500 Pearl Street
New York, New York 10007-1312

